



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 13 2011

REPLY TO THE ATTENTION OF:

Robert Hodanbosi
Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hodanbosi:

It was my pleasure meeting with you and your staff on May 12, 2011 in Columbus, Ohio, for our annual air program planning meeting. We appreciate the opportunity to hold this productive discussion, and your sustained commitment to environmental progress. Overall, I am pleased with the direction of your air program.

The issues that were discussed, in addition to the ongoing programmatic elements, should form the foundation of the Air Continuing Program Agreement and help ensure that sustained environmental progress is made in Ohio. The enclosed summary identifies action items from the meeting.

We look forward to continuing our productive working relationship and supporting the continued success of the Ohio Environmental Protection Agency's air pollution control program. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cheryl L. Newton".

Cheryl L. Newton
Director

Air and Radiation Division

Enclosure

cc: Cory R. Chadwick, Program Manager
Hamilton County Department of Environmental Services
Air Quality Programs

John Paul, Supervisor
Regional Air Pollution Control Agency
Montgomery County Combined Health District

Cindy DeWulf, Assistant Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency

Chris Nye, Fiscal Officer
Division of Air Pollution Control
Ohio Environmental Protection Agency

Dave Brown, Supervisor, Contracts and Planning Unit
Division of Air Pollution Control
Ohio Environmental Protection Agency

**Ohio Environmental Protection Agency, Regional Air Pollution Control Agency, Hamilton
County Department of Environmental Services
and
U.S. Environmental Protection Agency**

Annual Air Program/Environmental Performance Partnership Discussion

May 12, 2011

On May 12, 2011 staff from the Ohio Environmental Protection Agency (OEPA), Regional Air Pollution Control Agency (RAPCA), Hamilton County Department of Environmental Services (HAMCO), and the U.S. Environmental Protection Agency, Region 5, Air and Radiation Division (ARD) met to discuss progress of air pollution control activities committed to in the current Clean Air Act, Section 105 work plan and the upcoming work plan for the next fiscal year and beyond. The following are agreed upon action items of our respective agencies.

Action Items by Ohio and EPA

1. OEPA has agreed that in instances where redesignation requests for PM areas are submitted, that EPA should take action on the redesignation requests and not act on already submitted attainment demonstrations.
Contact: Mike Leslie, EPA; Jennifer Hunter, OEPA
Time frame: Fall 2011
2. OEPA will work with EPA to finalize the draft air program work plan for inclusion in the new EnPPA and PPG.
Contacts: Diane Nelson, EPA; Cindy DeWulf, OEPA
Time frame: July 2011
3. Issue eight power plant/refinery permits.
Contacts: Pamela Blakley, EPA; Mike Hopkins, OEPA
Time frame: Fiscal Year (FY) 2011
4. Issue 12 power plant/refinery permits.
Contacts: Pamela Blakley, EPA; Mike Hopkins, OEPA
Time frame: FY 2012
5. Issue 45 Title V renewal backlog permits.
Contacts: Pamela Blakley, EPA; Mike Hopkins, OEPA
Time frame: Calendar Year (CY) 2011
6. Issue 60 Title V renewal backlog permits.
Contact: Pamela Blakley, EPA; Mike Hopkins, OEPA
Time frame: CY 2012
7. Conduct Compliance Assurance Monitoring training.

Contacts: Kaushal Gupta, EPA; Andrew Hall, OEPA
Time frame: Summer 2011

8. Conduct greenhouse gas permit training.

Contacts: Richard Angelbeck, EPA; Andrew Hall, OEPA
Time frame: Summer 2011

9. School Air Toxics (SAT) sampling at East Liverpool. One SAT site had to collect more samples. In East Liverpool, there will be two types of monitoring.

- a. The PM_{2.5} monitoring should begin shortly and go for six months. We do not have a time frame for when the monitoring will begin.
- b. The semi-continuous metals monitoring is scheduled to begin approximately mid-summer (aiming for July 1, 2011) and go for three months. The equipment is being used elsewhere, so we cannot guarantee the start date.

Contacts: Loretta Lehrman, EPA; Randy Hock, OEPA
Time frame: See above description for specifics

10. Begin new monitoring (Lead, Near-road NO_x and CO, SO₂) as new requirements take effect, if funding is available.

Contacts: Loretta Lehrman, EPA; Randy Hock, OEPA
Time frame: All new lead monitoring at source oriented locations is required to be operational by December 29, 2011.
All new NO₂ Roadway monitoring is required to be operational by January 1, 2013.
All new CO Roadway monitoring is required to be operational by January 1, 2013.
All new SO₂ monitoring is required to be operational by January 1, 2013.
If finalized the ozone monitors should be operational the first day of ozone season in 2013.

11. Implement phased-in approach for monitoring changes recommended by LADCO in five year network assessment.

Contacts: Loretta Lehrman, EPA; Randy Hock, OEPA
Time frame: January 1, 2012

12. EPA and OEPA will further review and discuss the correct reporting of newly identified violations occurring after 30 days for sources which may already be listed on the High Priority Violations (HPVs) report.

Contacts: Rochelle Marceillars, EPA; Mike Ahern, John Paulian, Tom Kalman, and Mike VanMatre, OEPA
Time frame: June 15, 2011

13. EPA will provide the minimum data requirements (MDRs) to OEPA while the development of OEPA's new database system is in progress. Discussion will be held between the agencies to ensure the required elements to be reported to EPA is included in the new system.

Contacts: Rochelle Marceillars, EPA; Adam Ward and Mike VanMatre, OEPA
Time frame: June 15, 2011

Action Items by EPA

1. EPA will review Ohio's emissions reduction estimates for the I/M program and compare the analyses with what other states have done. EPA will provide comments and feedback on this analysis to OEPA.

Contacts: Doug Aburano, EPA; Mike Riggleman, OEPA
Time frame: June 2011

2. EPA will continue to work on PM2.5 redesignation requests, noting that the Huntington-Ashland and Cincinnati areas are priority areas for the state.

Contacts: Mike Leslie, EPA; Jennifer Hunter, OEPA
Time frame: Fall 2011

3. EPA will provide OEPA the proposed dates for the proposal and promulgation of the Ferroalloys residual risk standard. From the latest RTR rulemaking schedule (these are the negotiated dates as a result of litigation): the proposed date is October 31, 2011 and the final date rule is June 29, 2012. The facility may have two or three years to come into compliance if the rules changes are substantial enough.

Contacts: Jaime Wagner, EPA; Paul Koval, OEPA
Time frame: Completed May 16, 2011

4. EPA will provide OEPA with another copy of the most recent Region 5 HAP screening, as well as a copy of the HAP screening done for the Cincinnati area.

Contacts: Motria Caudill, EPA; Paul Koval, OEPA
Time frame: Completed May 16, 2011

5. EPA will provide to OEPA an additional copy of the NATA High-Risk Facility List.

Contacts: Jaime Wagner, EPA; Tom Velalis, OEPA
Time frame: Completed May 16, 2011

6. EPA will share updated information about our analysis of Ferro Corp. with OEPA. Once the analysis is completed, EPA will share it with OEPA.

Contacts: Jaime Wagner, EPA; Paul Koval, OEPA
Time frame: Summer 2011

7. EPA to provide OEPA with a comparison showing how OEPA's HPV identification and addressing rates compare to that of other States in the nation.

Contacts: Rochelle Marceillars, EPA; Bob Hodanbosi and Mike Ahern, OEPA
Time frame: June 15, 2011

8. EPA to determine whether a process is available in AFS to remove sources from the High Priority Violations list that are awaiting a permit revision or the issuance of a permit that would put them in compliance.
Contacts: Rochelle Marceillars, EPA; Mike Ahern, John Paulian, Tom Kalman, OEPA
Time frame: June 15, 2011
9. Publish final rulemaking on Ohio's Permit to Install and Operate rules.
Contact: Kaushal Gupta, EPA
Time frame: December 2011
10. Publish final rulemaking on Ohio's Permit by Rule.
Contact: Kaushal Gupta, EPA
Time frame: December 2011
11. Publish final rulemaking on PSD revision for greenhouse gas.
Contact: Richard Angelbeck, EPA
Time frame: December 2011
12. Publish final Title V program revision for greenhouse gas.
Contact: Richard Angelbeck, EPA
Time frame: March 2012
13. Communicate to Headquarters/OAQPS problems Ohio is having with recent changes to data file formats, data reporting, and grant changes from 105 to 103.
Contacts: Loretta Lehrman, EPA; Randy Hock, Gary Engler, OEPA
Time frame: September 1, 2011

Action Items by OEPA

1. OEPA will provide comments to EPA on the NATA High-Risk Facilities List as appropriate.
Contacts: Jaime Wagner, EPA; Paul Koval, Tom Velalis, OEPA
Time frame: June 30, 2011
2. OEPA will share a draft of the PM2.5 modeling group document with EPA.
Contacts: John Summerhays, EPA; Bob Hodanbosi, OEPA
Time frame: Fall 2011
3. Find training location and dates for semi-continuous metals study.
Contacts: Loretta Lehrman, EPA; Randy Hock, OEPA
Time frame: Summer 2011